

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**TO BE FILED
UNDER SEAL**

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In the Matter of the Arbitration of	:
	:
SECURITY INSURANCE COMPANY OF HARTFORD	:
Itself and as Successor in Interest to	:
THE FIRE AND CASUALTY INSURANCE COMPANY	:
OF CONNECTICUT and THE CONNECTICUT	:
INDEMNITY COMPANY,	:
	:
Petitioner,	:
	:
-against-	:
	:
COMMERCIAL RISK REINSURANCE COMPANY	:
LIMITED (BERMUDA) and COMMERCIAL RISK RE-	:
INSURANCE COMPANY (VERMONT),	:
	:
Respondents.	:
	:
	:
	:X:
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Docket No. 07 CV 3277 (VM)

**REPLY DECLARATION OF
MICHELE L. JACOBSON
IN FURTHER SUPPORT OF
PETITION FOR ORDER
COMPELLING
ARBITRATION**

MICHELE L. JACOBSON, hereby declares under penalty of perjury that the following
is true and correct:

1. I am a member of the firm of Stroock & Stroock & Lavan LLP, attorneys for Petitioner Security Insurance Company of Hartford, Itself and as Successor in Interest to the Fire and Casualty Insurance Company of Connecticut (“SICH”). I submit this Reply Declaration in further support of Petitioner’s Reply Memorandum of Law in support of its motion to compel Respondents Commercial Risk Reinsurance Company Limited (Bermuda) (“Commercial Risk Bermuda”) and Commercial Risk Re-Insurance Company (Vermont) (“Commercial Risk Vermont”) to arbitrate, in accordance with the terms of the arbitration clauses in five Quota Share Reinsurance Contracts, before the Umpire who was duly selected by Commercial Risk and SICH, and on June 25-29, 2007 – the dates agreed upon by the parties and the Panel.

2. As counsel for SICH, I have personal knowledge of the facts set forth herein.
3. Annexed hereto as Exhibit 1 is a true and correct copy of the cover page of the Position Statement submitted by Respondents Commercial Risk Bermuda and Commercial Risk Vermont in the Non-DIG Arbitration, which reflects their acknowledgement that Mr. David Thirkill is the Umpire of the panel.

Dated: New York, New York
May 4, 2007



MICHELE L. JACOBSON

EXHIBIT 1

In the Matter of the Arbitration between:

Security Insurance Company of Hartford,

Petitioners,

and

Commercial Risk (Non-Dig),

Respondents.

B E F O R E :

**David Thirkill, Umpire
Theodor Dielmann, Arbitrator
Martin D. Haber, Arbitrator**

**POSITION STATEMENT OF
COMMERCIAL RISK (NON-DIG)**

D'AMATO & LYNCH
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